

**ELECTRONIC CHROME AND GRINDING
RESPONSE TO
US EPA 104(e) REQUEST FOR INFORMATION
OMEGA SUPERFUND SITE
Real Property at 9132 and 9128 Dice Road
Santa Fe Springs, California**

October 12, 2007

Attorney-Client Work Product, Privileged and Protected

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SECTION A

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October 13, 2007

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Linda Ketellapper, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105

Re: **104 (e) Request for Information – Omega Superfund Site**
Real Property at 9132 and 9128 Dice Road, Santa Fe Springs, CA

Dear Ms. Ketellapper:

This is the response to the agency's request for information related to the above referenced properties. There are two boxes of supporting documents. You will note from the table of contents that the responses have been broken up and are tabbed for easy reference. This document contains the responses to the first eight questions, while other tabs contain responses to the remaining questions presented in the August 13, 2007 letter to Phillip Reed.

1. The people answering these questions are: Philip W. Reed, residing at _____
He is the owner and Michael
Philip Reed, residing at _____
He is the General Manager.
2. Philip Reed is the current owner of the facilities at 9128 and 9132 Dice Rd., Santa Fe Springs, CA 90670. He has owned the property at 9128 Dice Rd. since 1967 and he has owned the property at 9132 Dice Rd since 1967. Copies of deeds could not be located for the properties in the files of the respondent. The search for these documents will continue and if located, they will be forwarded to the agency.

Linda Ketellapper
October 13, 2007
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3. At no time during ownership of Philip Reed from 1967 to the present were either of the properties rented or leased to any individuals or entities. Mr. Reed is the owner of Electronic Chrome & Grinding.
4. The prior owners of the properties are unknown, as is their addresses and phone numbers.
5. Electronic Chrome & Grinding, Inc. is currently operating at the locations and has been since ownership began in 1967. No other entity has ever operated at the properties.
6. Electronic Chrome & Grinding, Inc. is currently operating at the locations.
7. To the best of our knowledge, the properties were farm houses prior to our ownership. The only business operations that have ever occurred at the property were those of Electronic Chrome & Grinding.
8. The employees who have knowledge of the use and disposal of hazardous substances at 9128 and 9138 Dice Rd. are: Michael Philip Reed, residing at _____ He has been employed with Electronic Chrome & Grinding, Inc. since 4/1/1965 and is the General Manager; and Edward Kruck, residing at _____. He was employed here from 7/8/93 through 11/26/98, and since 12/11/200 to present. He is the Shop Superintendent.

I hope this satisfies the concerns of the agency. Having toured the facility and participated in the preparation of this response, there is no evidence of any releases whatsoever of contaminants of concern from these properties. This is a well run and clean facility which has been inspected many times without any major violations being noted. If you have any questions, feel free to call. Please direct all correspondence to this office.

Sincerely yours,


Thomas P. Schmidt

cc: Mike Reed
Nancy Newlander

SECTION B

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Response to EPA Question 9

1) Facility Information

Electronic Chrome and Grinding has operated at the site since 1968 to the present day. The company currently employs 21 people. The number of employees has remained relatively consistent over the last 40 years, varying slightly based on fluctuations in work load.

The facility was constructed in 1968. When constructed the facility was 5,506 square feet. In 1979 the facility expanded. In its current configuration the facility is 15,442 square feet.

Electronic Chrome and Grinding has only had one major operation, chrome plating of industrial parts. The plating line since its construction has been a closed-loop, hard chrome system. In support of the plating operations, the company performs grinding, abrasive blasting and polishing operations and machines parts to customer required dimensions. The company has one permitted chrome reduction wastewater treatment system in support of its plating operations. There is no industrial sewer connection or industrial wastewater discharge.

2) Current Facility Operations

i. Process Description

The company, since 1968, has performed hard chrome plating operations. Currently, chromed metal parts received from customers account for approximately 95% of the company's production. The chromed parts are typically stripped, pre-ground, bead blasted, plated and buffed. Parts received from customers that have not been previously chromed account for approximately 5% of the company's production. These parts are typically stripped, buffed, plated, and buffed. Some parts, or detail pieces will also be masked with wax so that only a portion of the part is plated.

The percentage of chromed vs. non-chromed parts received from customers has varied throughout the years. Records were not found regarding changes in the mix of parts received from customers. Currently the majority of the parts received are chromed drill rig rotors.

The customer parts come into the facility and are logged in at Shipping & Receiving. The parts are put on racks in the Racking Area. The racked parts are taken to the strip tank located in the exterior Wastewater Treatment Area containment cell and immersed into a pH 2 hydrochloric acid solution. The parts are removed from the strip tank with a forklift and rinsed with water while suspended over the strip tank.

The stripped parts are placed on a cart and will take two different paths dependant upon whether they were chromed or not chromed when received at the facility. Some parts or detail pieces will receive extra steps, some will be masked with wax so that only a portion of the part is plated, some will be cleaned, some will be machined, and some will be repaired.

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Chromed Parts: The stripped previously chromed parts are taken to the Chrome Shop and placed on storage racks. Dependent upon the customer specifications or condition of the parts, they are sent to the Grind Shop for grinding, machining, or repair.

Some parts are also bead blasted before plating. These parts are taken from the Grind Shop to the Rectifier Area for abrasive blasting. From the Grind Shop or Rectifier Area the parts are taken to the Chrome Shop for plating. Once plated, the parts are taken to the Buffing Area for final polishing.

Non-chromed Parts: The stripped, non-chromed parts are taken to the Buffing Area and placed on storage racks. The parts will be buffed. Once buffed, the parts are taken to the Chrome Shop for plating. Once plated, the parts are taken to the Buffing Area for final polishing.

ii. Plating Process

Parts from the Buffing Area, Grind Shop, or Rectifier Area are taken to the Chrome Shop for plating. The part(s) is (are) immersed into one of the six operating plating tanks based on its dimensions. All six tanks contain the same chrome plating solution. The length of time the parts remain in the tanks is dependent on the customer thickness requirements. The process can plate 1,000th of an inch per hour. The parts are removed and rinsed over the plating tank, once dried they are taken to the Buffing Area.

Overspray or rinse water and daily floor cleaning water collects in the approximate 1,000 gallon collection sump in the center of the Chrome Shop. The sump is checked daily and any liquid is pumped into Tank WT1 of the wastewater treatment system. Typically, no more than one inch of water accumulates in the sump.

The tanks are equipped with double sided draft hoods to capture the chromic acid mist. The tanks are sloped and are equipped with a drain at the rear. The exhaust condensate drains into a plastic container at the rear of each tank. The condensate solution is poured back into the tank bath water approximately once per week.

The tank bath water is tested and adjusted monthly. When required, a ChromePur portable closed loop electrostatic precipitator is used to remove excess metals and extend the useful life of the bath water. The bath water is pumped from the tank, run through the precipitator and is returned to the tank. For a tank, the bath water is run through the system for approximately one month. The collected sludge is put into the filter press and is removed as filter cake. The precipitator plates are cleaned (as needed) and the waste is commingled with the wastewater treatment system filter cake waste. The tank filters are removed and commingled with the wastewater treatment system filter cake waste to be recycled.

Occasionally, the tank bath water is pumped out and removed by a licensed waste hauler for off-site recycling.

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iii. Maintenance Activities

Typical plant maintenance, repair activities are performed in the Welding Shop adjacent to the south of Shipping and Receiving. Welding gases, paint, acetone, and consumer products are used/stored in this area.

iv. Hazardous Material Storage

Hazardous materials are stored in the following locations:

Hazardous Materials Storage

Shipping & Receiving	Two hazardous material storage cabinets Miscellaneous consumer quantity containers Paint Acetone WD-40 PVC Primer Blue glue pipe cement Weld-on primer Aerosols Cleaning products Lubricating oils Grease
Exterior containment cell	Sodium hydroxide tank & drum Hydrochloric acid tank Acid strip tank Wastewater treatment system process tanks Polymer drum
Exterior equipment shed	Chromium trioxide, anhydrous
Buffing Area	Buffing compound PV-120
Chrome Shop	Plating tanks Chromic acid Sulfates Sulfuric acid Barium carbonate
Maintenance Shop	Acetylene Argon Oxygen Propane Paints Gasoline
Rectifier Area	Aluminum oxide Bead blast

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Hazardous Materials Storage

Grinding Area	Recovery System 30 mineral spirits, parts washer Equipment cutting fluid reservoirs Cutting fluids Coolant Motor oil WD40 Spindle oil Metal working fluid Kleenzol DY Acetone Floor finish
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v. Wastewater Treatment System

The wastewater treatment system has been in operation since 1993 and is operated under a Permit-By-Rule Conditional Authorization Permit. The wastewater treatment system is a chrome reduction unit utilizing pH adjustment, chrome reduction, coagulation and flocculation, gravity settling and a filter press. The treatment system incorporates treated water recycling and reuse methods. Previously, a treated water evaporation system was utilized. The treatment system is located outdoors, within secondary containment, at the rear of the property (the eastern boundary).

Waste hydrochloric acid solution from the acid stripping tank is manually pumped to the first stage of the system tank WT1, the acid/chrome holding tank. Cleaning waste waters are manually pumped into tank WT1, as well as wastewater from the Chrome Shop collection sump.

The waste acid/chrome solution is pumped from the holding tank to tank WT2, a two chamber chrome reduction and precipitation tank. In WT2 magnesium hydroxide is automatically added by the Kruger & Echels pH controller for pH adjustment. The solution gravity flows to the second stage where sodium hydroxide and sodium hydrosulfite are automatically added by the pH controller and ORP controller to reduce hexavalent chromium to trivalent chromium and start the metal precipitation process.

The treated solution is piped from WT2 to WT3, a polymer flash mix and holding tank where an anionic polymer is added for effective flocculation. The solution overflows into WT4 a holding tank for additional residence time. Tanks WT3 and WT4 are mixed by air sparging.

From WT4 the solution is pumped into WT5, a two stage clarifier where the solid flocculate is allowed to settle. Two cone bottom feeds allow the solids to be pumped to the plate and frame filter press, FP. The filtered water is pumped from the filter press back into WT5 or transferred into WT6 the rinse water holding tank. Rinse water from WT6 is pumped back into the strip tank.

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The filter cake is discharged from the press into a rolling storage bin and is manually shoveled into a plastic lined DuroPack II container.

vi. Waste Handling

Grind Shop: The grinding sludge is put into 55-gallon metal drums in the satellite storage area. The drums are removed for recycling. Waste oils and cutting fluids from the equipment are put into one waste oil tote. The waste oil is removed for recycling. The parts washer waste mineral spirits is collected and recycled. The daily floor sweeping wastes are commingled with the drummed grinding sludge waste in the satellite storage area, or with the wastewater treatment system filter cake waste. Liquid floor cleaning wastes are put into Tank WT1 of the wastewater treatment system.

Rectifier Area: The spent blasting wastes and the daily floor sweeping wastes are commingled with the boxed buffing waste in the Buffing Area or the boxed wastewater treatment system filter cake waste. Liquid cleaning wastes are put into Tank WT1 of the wastewater treatment system.

Plating Shop: The collection sump is inspected daily and any liquids are pumped into Tank WT1 of the wastewater treatment system.

The ChromePur precipitator bath water sludge is put into the filter press of the waste water system and is removed as filter cake. The waste tank filters are removed and commingled with the wastewater treatment system filter cake waste.

The tank bath water is occasionally pumped into a TT and removed for off-site recycling.

Buffing Area: The buffing wastes are put into a plastic lined DuraPack II box located in the Buffing Area. The daily floor sweeping wastes are commingled with the buffing waste. The buffing waste is ultimately removed for recycling. Liquid cleaning wastes are put into Tank WT1 of the wastewater treatment system.

Wastewater Treatment System: The filter cake waste is removed for off-site for recycling. Storm water collected in the containment cell is pumped into Tank WT1 of the treatment system.

Equipment Shed: Wastewater from the sink located in the equipment shed is occasionally pumped into Tank WT1 of the wastewater treatment system.

Welding Shop: Small quantities of waste Freon are generated.

3) Historical Changes in Operations

The company since its establishment has operated a closed loop, hard chrome plating line. Changes to the process generally have been minimal.

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Eight tanks were originally associated with the plating line when constructed. Changes to the line have included the addition of dual draft hoods, exhaust fans, and Hexmaster/Retro-Hex scrubber air pollution control device in 1982.

An expansion in 1979 added the building at 9128 Dice Road that increased ECG's grinding capacity. At about this time the septic tank system was removed in conjunction with a City street widening project, and the facility was hooked up to the City sanitary sewer system. A septic line located near the restroom/sink area of the Chrome Shop was filled and abandoned in 1970. The septic system was never used for disposal of process fluids or wastes.

A wastewater treatment system was added in 1982. The strip tank secondary containment cell was increased in about 1992 to include the wastewater treatment system. At this time the concrete surface and containment area was coated with epoxy. Previously, liquid wastes were transported off-site for treatment or disposal. The filter press was added.

Maintenance activities were originally performed in the former Welding Shop, the current day Equipment Shed.

4) Physical Description

a. Surface Structures

Buildings

The facility is comprised of two main buildings, the original 5,500 square foot building at 9132 Dice Road containing the Chrome Shop, and the 1979 expansion building at 9128 Dice Road containing the Grind Shop. Other structures include the

- 28 sq.ft. air compressor wood shed,
- 60.5 sq.ft. rectifier (plating tank 1) wood shed,
- 345 sq.ft. metal corrugated equipment shed, wax tank and storage shed,
- 2,496 sq.ft. canopy covering the Buffing Area, adjacent to south of the Chrome Shop, and
- 826 sq.ft. canopy covering the Rectifier Area, located between the 9128 and 9132 buildings.

Two adjacent buildings located at 9126 and 9142 Dice Road are owned by the owner/operator of ECG, Mr. Philip Reed, but are not used by the facility/ECG.

Neither of these buildings has ever had any activities related to hazardous waste storage, manufacturing, or processing by ECG.

Above Ground Tanks

There are six above ground tanks and a filter press located outdoors associated with the wastewater treatment system. The wastewater treatment tanks and filter press are located within

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a secondary containment structure. The tank identification and sizes are provided in Table 1 below.

Table 1 - Exterior Wastewater Treatment System Tanks

Tank ID	Description	Dimensions (L x W x H)	Capacity (gallons)
WT 1	Vertical polyethylene waste liquid storage tank, wastewater treatment system	4' dia x 5'	500
WT2	Chrome reduction and precipitation steel lined tank, wastewater treatment system	3' x 6' x 5'	700
WT3	Polyethylene holding tank for flocculent addition, wastewater treatment system	3' x 2' x 20"	100
WT4	Polyethylene holding tank for flocculation, wastewater treatment system	2' x 1.5' x 20"	40
WT5	Two stage, steel clarifier, wastewater treatment system	7' x 3.5' x 3' Cone 2' h	700
WT6	Steel, rinse water storage tank, wastewater treatment system	64" x 28" x 30"	200
FP	Horizontal, modified cross linked polyethylene steel framed filter press, wastewater treatment system	8' x 3' x 4'	4 cu.ft.
	Concrete containment cell, wastewater system, supply tanks, acid strip tank	40' x 9.5' x 9"	2,150

There are two exterior, above ground reagent tanks that feed the wastewater treatment system. The two tanks are situated within the concrete containment cell that also holds the wastewater treatment system and the acid strip tank. Tank information is included in Table 2 below. Containment cell information is included in Table 1 above.

Table 2 - Exterior Reagent Tanks

Tank ID	Description	Dimensions (L x W x H)	Capacity (gallons)
HCL	Vertical, polyethylene hydrochloric acid supply tank, wastewater treatment system	4' dia. x 5'	500
Mag50	Vertical, polyethylene magnesium hydroxide supply tank, wastewater treatment system	4' dia. x 5'	500

There are three exterior above ground process tanks. One tank, the acid strip tank is situated within the concrete containment cell that also holds the wastewater treatment system. Two tanks are located within the Equipment Shed adjacent to the containment cell. Tank information is included in Table 3 below. Containment cell information is included in Table 1 above.

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Table 3 - Exterior Process Tanks

Tank ID	Description	Dimensions (L x W x H)	Capacity (gallons)
NA	Rubber lined steel, acid strip tank	3' x 22' x 2'	987
NA	Metal wax tank, masking, equipment shed	4' x 2' x 3'	180
NA	Metal holding tank below the sink, equipment shed	2' x 2' x 2'	60

There are seven aboveground plating tanks situated in three epoxy coated concrete vaults located in the Chrome Shop. Of the seven tanks present in the Chrome Shop six are used, Tank 5 is not operational and is not used. Tank information is included in Table 4 below.

Table 4 -Interior Chrome Shop Plating Tanks

Tank ID	Description	Dimensions (L x W x D)	Capacity (gallons)
1	Metal with flex liner plating tank	6' x 2.5' x 10'	1,280
3	Metal with flex liner plating tank	6.5' x 3' x 6.5'	860
4	Metal with flex liner plating tank	8' x 9' x 6.5'	2,618
5	Metal with flex liner plating tank, not used	7.5' x 7' x 6'	1,000
6	Metal with flex liner plating tank	6' x 4' x 4'	1,000
7	Metal with flex liner plating tank	6' x 3.5' x 4'	1,000
8	Metal with flex liner plating tank	6' x 3.5' x 4'	1,000

There is one 250 gallon above ground waste oil, plastic tote in the satellite hazardous waste storage area in the Grind Shop. The tote is situated on a containment pallet.

b. Subsurface Structures:

There are three concrete subsurface equipment vaults in the floor of the Chrome Shop. The vaults are original to the building and are used for the plating tanks. The concrete has an epoxy coating. Plating tanks 1, 3, 4, and 5 are situated above Vault 1. Vault 12 has a variable depth (4-10 ft.) corresponding to the plating tank depths. Plating tanks 6 and 7 are situated above Vault 2 and plating tank 8 is situated above Vault 3.

There is one, 1,000-gallon epoxy coated concrete collection sump in the Chrome Shop. The collection sump is inspected daily and is pumped into the wastewater treatment system if needed.

c. Ground Water and Dry Wells:

There are no ground water wells or dry wells on the property.

d. Storm Water and Sewage Systems:

There are no storm water drains or features on the property. Storm water impacting surfaces at the rear of the property collects in the wastewater containment cell or on the surface, and is then pumped into Tank WT1. Storm water impacting surface at the front of the property sheet flows

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into the gutter and City storm drain system. Before the facility was constructed in 1968, the property was used as a single-family residence.

Currently, sanitary wastes are plumbed into the City sewer system. There are no industrial discharges to the sewer. Previously, the facility had a septic tank system.

The septic tank was removed in 1970. The septic tank system was removed in conjunction with a City street widening project, and the facility was hooked up to the City sanitary sewer system. The septic line in the Chrome Shop was filled and abandoned in 1970. There was no regulatory oversight and no records remain.

e. Physical Structure Changes:

The original facility (9132 Dice Rd.) consisted of one 5,506 sq.ft. building. In 1979, the structures expand to 15,442 sq.ft., with the addition of 9126, and 9128 Dice Rd. A single-family residence was demolished during this expansion. No other structures were demolished at the property.

f. Waste Storage, Accumulation and Disposal:

There are and have been no waste disposal areas, dumps, leach fields, burn pits or other disposal to the property.

Waste storage areas include the:

- Grind Shop: Waste oils and cutting fluids are stored in one 250-gallon tote.
- Buffing Area: Solid grinding and buffing waste is stored in DuraPack II box containers.
- Wastewater Treatment Area: Solid filter cake waste is stored in DuraPack II box containers.
- Equipment Shed: Wastewater from the sink collects and is temporarily stored in an under sink tank.

Waste accumulation areas include the:

- Grind Shop: Grinding sludge is stored 55-gallon metal drums in the satellite storage area.

SECTION C

Response to Question 10a & 10b

No hazardous substances have been manufactured, generated, or produced at the site. Hazardous substance use information is follows:

Trade / Brand Name	Chemical Composition	%	Quantity Used	UOM	Period of Use	Process Used In
Acetone	Acetone	100	NA		NA	Maintenance/Parts Cleaned
Acetylene	Acetylene	100	NA		NA	Welding
Argon	Argon	100	NA		NA	Welding
Barium Carbonate	Barium	N/A	275	lbs.	2003 - 2007	Plating
Buffer Solution pH 4.01 +/-0.02	Demineralized Water	95	1	liter	2003 - 2007	QA/QC check of ph
	Other Components	1				
	Potassium Acid Phthalate	5				
Buffer Solution pH 7.00 +/- 0.02	Demineralized Water	95	1	liter	2003 - 2007	QA/QC check of ph
	Other Components	1				
	2, 4-Dinitrophenol	0.01				
Caustic Soda-Beads	Sodium Hydroxide	97.6				Plating tanks
Cimstar	Cimstar Coolant	NA	110	gals.	2003 - 2007	
Chevron Tegra ® Synthetic Compressor Oil	1-Decene, Homopolymer, Hydrogenated	85	NA		NA	Air Compressors
	Synthetic Base Stock	13				
	Additives	2				
Chevron Bright-Cut Metal Working Fluid, NHG			10	gals.	2003 - 2007	Grinding Equipment
Chevron Hydraulic Oil AW ISO 22	Highly Refined Mineral Oils	100	55	gals.	2003 - 2007	Grinding Equipment
Chevron Way Oil Vistac	Lubricating Base Oil Severely Refined Petroleum Distillate	97	55	gal	2003 - 2007	Equipment Motors
	Additives	3				
Chromic Acid	Chromium trioxide	99	17,857	lbs.	2003 - 2007	Plating Tanks
Chromium Trioxide	Chromium trioxide	100	31,858	lbs.	1990 - 1992	
Chromium Trioxide	Chromium (VI) oxide	100				
Cool Lube 2600	Petroleum Oil	80	NA		NA	Grinding Equipment
Dascool 840 (#2712)	Hexahydro-1,3, 5-TRIS (2-Hydroxy Ethyl)-S-Triazine	3	55	gal	2003 - 2007	Grinding Equipment
	Carboxylic Acids with Alkanolamines	4				
	Polyoxyethylene Phenyl Ether Phosphate	2				
	Poly(oxyethylene-(Dimethylimino) ethylene-(Dimethyliminio) ethylene dichloride}	2				
	Alcohols, Ethoxylated, Propoxylated	3				
	Monoethanolamine	10				
	Triethanolamine	10				

Response to Question 10a & 10b

No hazardous substances have been manufactured, generated, or produced at the site. Hazardous substance use information is follows:

Trade / Brand Name	Chemical Composition	%	Quantity Used	UOM	Period of Use	Process Used In
Formax			146	EA	2003 - 2007	Chrome solution
Free With Molly Aerosol	Aliphatic Petroleum Distillate	not given	NA		NA	Chrome solution
	Ethyl Acetate	"				
	Sodium Petroleum Sulfonate	"				
	Light Naphthenic Hydrotreated Distillate	"				
	Isobutane	"				
	Propane	"				
	Oil Mist Values	"				
FT Degrease Resist Ink Blue	Methyl Isobutyl Ketone	67	NA		NA	NA
	Cyclohexanone	20				
	Vinyl Resin	8				
	PCN Blue	5				
Greaseless Satin-Glo Polishing Compound	Aluminum Oxide	38	5749	lbs.	2003 - 2007	Buffing
	Silicon Carbide	23				
	Collagen	20				
	Rouge	2				
	Water	17				
Stainless Steel Polishing Compound	NA	NA	438	lbs.	2003 - 2007	Buffing
Hi-Chem Mag-50	Magnesium Hydroxide	65	41751	lbs.	2003 - 2007	WW Treatment System
Kerosene					1998	Parts Cleaning
Ketone	Acetone	100	NA		NA	Maintenance, Parts Cleaning
KLEENAPART 170	Hydrotreated Light Petroleum Distillates	95	NA		NA	Maintenance
KWIK-SOLV	Heptane; n-heptane	80	NA		NA	Maintenance
	Ethanol; ethyl alcohol; grain alcohol	30				
Mineral Spirits (1% Solvent)			161	gal	2003 - 2007	Parts Cleaning
Mercury	Mercury Metallic Mercury	100	12	lbs.	2003 - 2007	Plating
Methyl Ethyl Ketone, MEK	2-Butanone	N/A	80	gal	1990	Manual parts cleaning
			80	gal	1991	
			110	gal	1992	
MT-920 Liquid Maskant			1	gal	2003 - 2007	
Muriatic Acid	Hydrochloric Acid	35	6453	gal	2003 - 2007	WW Treatment System

Response to Question 10a & 10b

No hazardous substances have been manufactured, generated, or produced at the site. Hazardous substance use information is follows:

Trade / Brand Name	Chemical Composition	%	Quantity Used	UOM	Period of Use	Process Used In
Navajo Pumice	Pumice (Primarily Silicon Oxide)	N/A	NA		NA	Abrasive Blasting
NSPEC GS - 40 Cleaner	"Confidential Information"	N/A	NA		NA	NA
Oxygen, O ₂	Oxygen	100	NA		NA	Welding
Propane	Propane	100	NA		NA	NA
Rando HD 46	Hydrotreated heavy paraffinic	97.99	NA		NA	Buffing
	Polymer additives	2.99				
Shell Solvent B HT	Solvent Naphtha (Petroleum), Light Aliphatic	100	NA		NA	Maintenance, Parts Cleaning
Shell Spindel Oil 22	Mixture	100	55	gals.	2003 - 2007	Grinding Equipment
Sisal	NA	NA	15	EA	2003 - 2007	NA
SMOOTH SCRUB	Nonylphenoxy poly(ethyleneoxy) ethanol	5	NA		NA	Personal Hygiene
Sodium Hydroxide 10-50% Liquid	Sodium Hydroxide	50	16,985	lbs.	2003-2007	WW Treatment System
VinMet 1140	Sodium hydroxide	NA	530	lbs.	2003 - 2007	WW Treatment System
Sulfuric Acid 75-99%	Sulfuric Acid	99	9	gal	2003 - 2007	Plating Tanks
	Sulfur dioxide	2				
Sulfuric Acid (93-99%)	Sulfuric Acid	99				Plating Tanks
	Water	7				
Sulfuric Acid	Sulfuric Acid	93				
Trichloroethane	1,1,1-trichloroethane	NA	440	gal	1990	Manual parts cleaning
			495	gal	1991	
			440	gal	1992	
ULTRAGLO 8810	Iron Oxide	10	NA		NA	Buffing
	Borax	80				
	Sodium Carbonate	5				
	Alcohol Alkoxylate	5				
	Ethylene Glycol	5				
	Sodium Benzoate	5				
	2, 4, 7, 9-tetramethyl-5-decyne-4-7-diol	5				
	Proprietary defoamer	5				
	Sodium dioctyl sulfosuccinate	10				
Virtex D Concentrated Sodium Hydrosulfite Powder	Sodium Hydrosulfite	91	1179	lbs.	2003 - 2007	Plating Tanks
	Alkaline Stabilizers	1				

Response to Question 10a & 10b

No hazardous substances have been manufactured, generated, or produced at the site. Hazardous substance use information is follows:

Trade / Brand Name	Chemical Composition	%	Quantity Used	UOM	Period of Use	Process Used In
WD-40	Aliphatic Petroleum Distillates	50	NA		NA	Maintenance
	Petroleum Base Oil	25				
	LVP hydrocarbon fluid	18				
	Carbon dioxide	3				
WYK Safety Sorbent	Silicon di-Oxide	72	NA		NA	Spill Clean-Up
	Calcium Oxide	4				
	Aluminum Oxide	17				
	Potassium Oxide	4.7				
	Iron Oxide	4				
	Sodium Oxide	5				

Response to Question 10.c and 10.d

Chemical/ hazardous substance			Waste description				Disposal			
Substance	Usage Location	Storage Location	Waste	Waste Code	Waste Code Description	Generation year range	Quantity	Units	Method	Facility
HCL	Strip Tank	N/A	Hydrochloric Acid/Chromium & Water	N/A	N/A	1978	2,000	G	Acid Well	Calabasas #5
N/A										
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	2,500	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	N/A	N/A	N/A	1979	3,000	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	2,500	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	3,000	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1979	350	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/ Chromic Acid/Water	N/A	N/A	1979	3,000	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	800	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	2,500	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid	N/A	N/A	1979	2,500	G	Acid Well	Calabasas #5

Chemical/ hazardous substance			Waste description				Disposal			
Substance	Usage Location	Storage Location	Waste	Waste Code	Waste Code Description	Generation year range	Quantity	Units	Method	Facility
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	3,000	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/Water	N/A	N/A	1979	600	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/ Water	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/ Water	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1979	N/A	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1979	300	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1979	3,000	G	Acid Well	Calabasas #5
N/A										
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Hydrochloric Acid/ Chromic Acid/Water	N/A	N/A	1980	3,000	G	Acid Well	Calabasas #5
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Acid Well	BKK
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Landfill	N/A
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	400	G	Acid Well	N/A

Chemical/ hazardous substance			Waste description				Disposal			
Substance	Usage Location	Storage Location	Waste	Waste Code	Waste Code Description	Generation year range	Quantity	Units	Method	Facility
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1980	2,500	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/ Chromic Acid/Water	N/A	N/A	1980	3,000	G	Landfill	BKK
HCL	Strip Tank	N/A	Hydrochloric Acid	N/A	N/A	1980	300	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	1,000	G	Acid Well	Calabasas #5
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	1,500	G	Acid Well	BKK
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Landfill	BKK
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	3,000	G	Landfill	BKK
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1980	3,000	G	Acid Well	BKK
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	56	Plating Solution Acid	1980	68	lbs	Acid Well	J&M Filter
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1980	2,500	G	Acid Well	N/A
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Acid Well	N/A
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	N/A	N/A	1980	300	G	Acid Well	N/A
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	N/A	N/A	1980	40	Bbls	Acid Well	EPC Westside Disposal
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	56	Plating Solution Acid	1981	60	Bbls	Land Treatment	EPC Westside Disposal
HCL	Strip Tank	N/A	Hydrochloric Acid/Water	56	Plating Solution Acid	1981	8	Bbls	Land Treatment	EPC Westside Disposal
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	2	Acid Solution	1981	50	Bbls	Land Treatment	EPC Westside Disposal

Chemical/ hazardous substance			Waste description				Disposal			
Substance	Usage Location	Storage Location	Waste	Waste Code	Waste Code Description	Generation year range	Quantity	Units	Method	Facility
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	56	Plating Solution Acid	1981	18	Bbls	Land Treatment	EPC Westside Disposal
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	2	Acid Solution	1981	35	Bbls	N/A	EPC Westside Disposal
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating tanks	N/A	Chromic Acid/ Water	56	Plating Solution Acid	1981	60	Bbls	Land Treatment	EPC Westside Disposal
Remainder of Years Grouped Together (Similar Waste Manifests)										
Mag 50, HCL, vitrol	Wastewater treatment system	Containment cell	Hazardous Waste Solid - Chromium (high chrome filter cake)	181	Other Inorganic Solid Waste	1989-2007	637,800	P	Recycling	Siemens Water Technologies Corp DeMenno/Kerdoon/ U.S. Filter Recovery Service D/K Environmental, Casmalia Resources
cutting fluids, metal shavings	Grinding equipment	Grind Shop	Non RCRA Hazardous Waste Solid - Grinding Sludge	352	Other Organic Solids	1989-2007	25,300	P	Recycling	Siemens Water Technologies Corp. DeMenno/Kerdoon D/K Environmental U.S. Ecology
coolant, motor oils	Grinding equipment	Grind Shop	Non RCRA Hazardous Waste Liquid - WW and Oil	223	Unspecified Oil-containing Waste	1989-2007	14,865	G	Recycling	DeMenno/Kerdoon
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating Tanks	Plating Tanks	Hazardous Waste Liquid - Chromium	723	Liquids with Chromium (VI) >= 500 Mg/L	1989-2007	3,150	G	Recycling	D/K Environmental, Norris Environmental Services
HCL	Strip Tank	Strip Tank	R.Q. Waste HCL - Lead, Chromium	792	Liquids with pH <= 2 with metals	1989-2007	800	G	Landfill Surface Impoundment	D/K Environmental
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating Tanks	Plating Tanks	R.Q. Waste Chromic Acid Solution - Arsenic, Chromium, Silver	792	Liquids with pH <= 2 with metals	1989-2007	5,300	G	Recycling	US Filter Recovery Services, Inc.

Chemical/ hazardous substance			Waste description				Disposal			
Substance	Usage Location	Storage Location	Waste	Waste Code	Waste Code Description	Generation year range	Quantity	Units	Method	Facility
Chromic acid, sulfates, sulfuric acid, barium carbonate	Plating Tanks	Plating Tanks	R.Q. Waste Corrosive Liquid, Acidic, Inorganic - Chromic Acid	791	Liquids with pH <= 2	1989-2007	9,650	G	Recycling	D/K Environmental, Disposal Systems Inc.
Chromic acid, sulfates, sulfuric acid, barium carbonate	Tank Sludge	Tank Sludge	Waste Hydrochloric Acid Mixture - Solid	241	Tank Bottom Waste	1989	7,000	P	Lanfill Surface Impoundment	Casmalia Resources

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Response to EPA Question 10 e., f., g.

e) Storage, treatment, or disposal permits.

Available records of facility permits for storage and treatment of hazardous wastes are included in the supporting documentation.

There has been no on-site disposal of wastes or hazardous substances.

f) Hazardous material business plans and chemical inventory forms.

Available records of the original and updated HMBP, including chemical inventory forms are included in the supporting documentation.

g) Manifests governing hazardous substances generated by ECG operations.

Available records of industrial waste manifests and hazardous waste manifests are included in the supporting documentation.

SECTION D

Attorney-Client Work Product, Privileged and Protected

Response to EPA Questions 11 through 14

11. Provide copies of permits for storage, treatment, or disposal of waste.

Documents relative to environmental practices at the facility are included in the supporting documentation.

12. Provide copies of technical or analytical environmental information, letters of enforcement, inspection notes, citizen complaints, and formal notices of violation.

Available records of agency inspections, notice of violations, and agency letters are included in the supporting documentation.

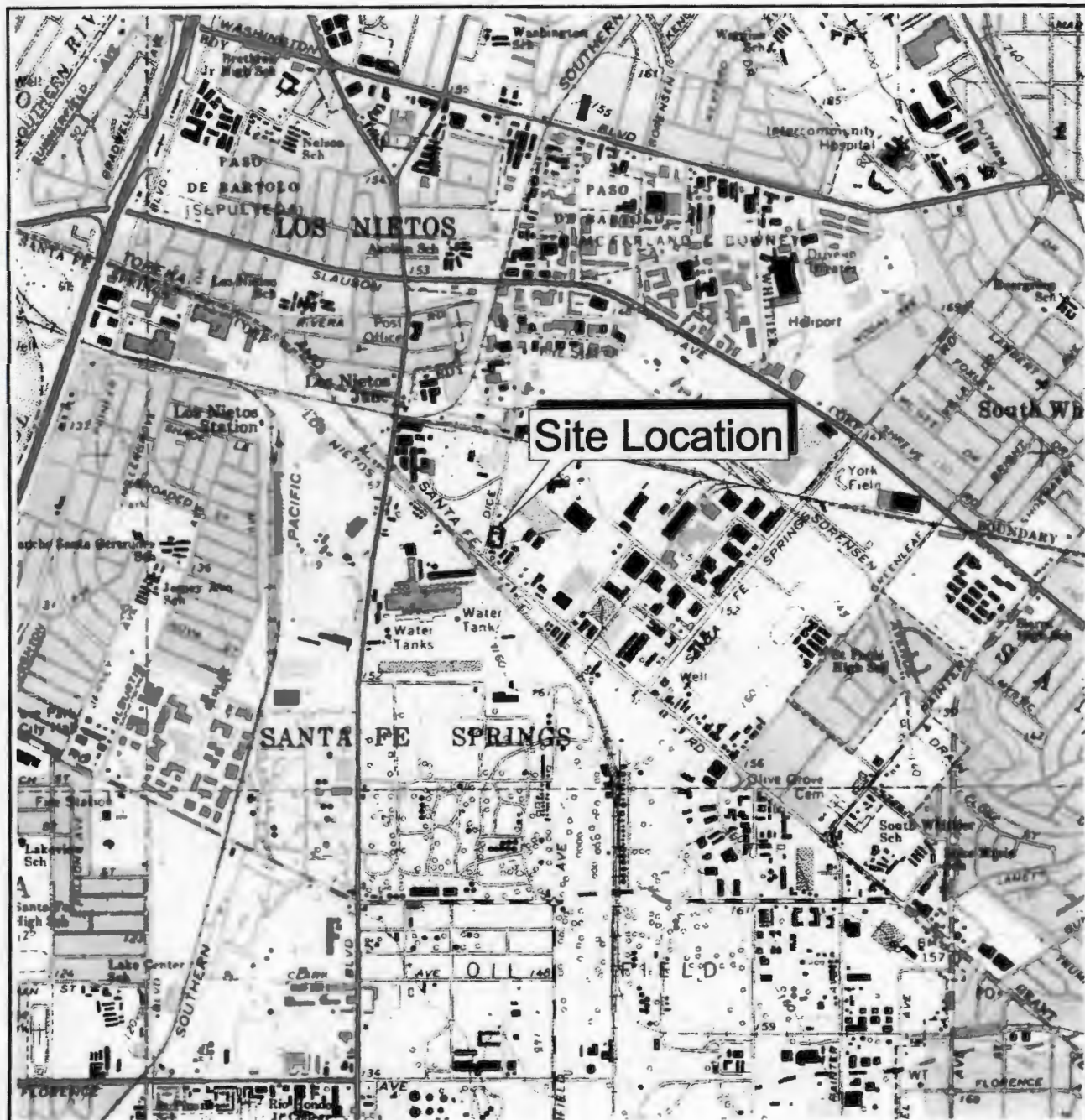
13. Provide copies of information and documentation related to approval of remediation or cleanup activities.

The facility has not been ordered to conduct any subsurface investigations of any type by any governmental environmental agency. There has not been any investigation, remediation or cleanup activities conducted during ECG's operations at the property.

14. At the time ECG's first took possession of the property, were you aware of any contamination.

ECG was not aware of any contamination of the property at the time of possession. No evidence of contamination of the property as the properties in question were farm land at the time of acquisition.

SECTION E



Reference:

1. U.S.G.S. Topographic Maps, Whittier, California 7.5 Minute Quadrangle. Georeferenced using the State of California's CASIL Online GIS Database, Copyright 2007.



WINEFIELD & ASSOCIATES, INC.
ENVIRONMENTAL AND SAFETY CONSULTANTS

DESCRIPTION

SITE LOCATION MAP

PROJECT

ELECTRONIC CHROME AND GRINDING CO. INC.

LOCATION

**9128-9132 DICE ROAD
SANTA FE SPRINGS, CALIFORNIA**

JOB NO.

ECG-07-139

DATE

10/12/07

FIGURE NO.

1

SECTION F

Attorney-Client Work Product, Privileged and Protected

**SUPPORTING DOCUMENTATION
TABLE OF CONTENTS**

EPA Question Number	Electronic Location	Document Number	Document Name
9, 12	Air	01	November 2, 1998 EPA Source Test Report for Cr Emissions.
9, 12	Air	02	April 12, 2004 CARB Chrome Emissions Inventory Survey
10.a 10.b, 10.e, 12	Air	03	1995 EPA TRI Report and 33-50 Program
10.d, 10.e, 12	Air	04	1990 and 1988 SC Form R Request
9, 12	Air	05	April 23, 1993 Prop 65 Air Quality Impacts
12	Air	06	December 4, 1992 AST Chromium Electroplating Emissions Comparison Test
9, 12	Air	07	2005-2006 AQMD Annual Emissions Report
9, 12	Air	08	2006-2007 AQMD Annual Emissions Report
12	Air	09	March 22, 1974 AQMD PTO P55637
12	Air	10	June 29, 2004 AQMD Hot Spots Program Fee Invoice
12	Air	11	October 5, 2004 AQMD Emissions Fee Invoice
12	Air	12	November 2, 2004 AQMD Expired Permits & Applications
9, 12	Air	13	2007 AQMD Various Recordkeeping Data
9, 12	Air	14	Rule 1169 Compliance Plan
9, 12	Air	15	1990 ATIR Notice
10.d	HW/HM	16	May 23, 2007 Land Disposal Restriction Form
9, 11	HW/HM	17	ECG HazWasteContingency Plan
10.c, 11	HW/HM	18	December 15, 1999 DTSC SB14 Receipt
12	HW/HM	19	April 17, 2006 HazWaste Tank Certification Email
9, 12	HW/HM	20	November 5, 2006 ESI Haz Waste Tank Certification
10.a	HW/HM	21	2007 Daily Hazardous Waste Tank Inspections
11	HW/HM	22	2007 HW Storage Area Weekly Inspections
12	HW/HM	23	2004 EPA Certification of Violation Correction
10.c, 10.d, 11, 12	HW/HM	24	July 16, 2007 DTSC SB14 Summary Progress Rpt
11	HW/HM	25	January 5, 1996 DTSC HW Transporter Registration
9, 10.c	HW/HM	26	July 24, 1995 DTSC Verification Inspection Report
9, 10.e	HW/HM	27	1995 Conditional Authorization Tier
9, 10.c	HW/HM	28	February 16, 2000 EPA PBR Permit
9, 10.c	HW/HM	29	February 13, 2007 EPA PBR Permit
9, 10.c	HW/HM	30	March 27, 1995 Annual Fire Dept Fees
9, 10.c	HW/HM	31	August 26, 1996 Fire Dept On-Site Waste Treatment Permit
12	HW/HM	32	February 12, 1997 Fire Dept. Annual Unified Program Certification
10.a, 10.b, 10.c, 12	HW/HM	33	December 31, 1999 Fire Dept. Haz Mat Business Plan

Attorney-Client Work Product, Privileged and Protected

**SUPPORTING DOCUMENTATION
TABLE OF CONTENTS**

EPA Question Number	Electronic Location	Document Number	Document Name
12	HW/HM	34	2001 Fire Dept NOV & Order to Comply
10.c	HW/HM	35	August 28, 2002 Fire Dept. Secondary Containment Requirement
10.c	HW/HM	36	September 2, 2004 Annual Tiered Permit Requirements
10.c	HW/HM	37	February 22, 2006 Annual Tiered Permit Requirements
12	HW/HM	38	November 7, 2006 Fire Dept. Inspection Rpt & NOV
10.e	HW/HM	39	Fire Dept. CUPA Permit and Fees
10.b, 10.c, 10.d, 12	HW/HM	40	1991 EPA Biennial Report
10.c, 10.d	HW/HM	41	1994 EPA Biennial Report
10.c, 10.d	HW/HM	42	1998 DTSC Biennial Rpt Notice
10.c, 10.d	HW/HM	43	1995 Biennial Rpt
		44	2001 Hazardous Waste Report
10.c, 10.d	HW/HM	45	2005 and 2003 EPA Biennial Rpt
10.g	HW/HM	46	Hazardous Waste Manifests
10.c, 10.d, 12	HW/HM	47	1987 - 2004 EPA Verification Questionnaire Manifest Summary
10.c, 10.d, 12	HW/HM	48	1994 - 2005 BOE Hazardous Waste Generator Fee Returns
9, 10.a	HW/HM	49	Purchasing records
12	HW/HM	50	Material Safety Data Sheets
9, 11	Prgms	51	Hazard Communication
11	Prgms	52	1987 CEC Notice of Preparation of the 1987 Biennial Rpt
11	Prgms	53	March 1992 SB198 Injury and Illness Prevention Program
11	Prgms	54	April 16, 1998 Duall 9026 Operation and Maintenance Manual
11	Prgms	55	ECG Code of Safe Practices
9, 11	Prgms	56	January 29, 2007 GSS Hazard Survey Action Plan
9, 12	Prgms	57	March 26, 1996 SCCBMFA Environmental Audit
9, 10.e	SW	58	1992 SWRCB Permit
9, 10.c, 10.e, 11, 12	WW	59	2001 Rescission of Discharge Reqmts
10.c, 10.d	WW	60	1977 - 1981 Industrial Waste Self Monitoring Reports
9, 10.e	WW	61	1987 LACSD Industrial Wastewater Discharge Permit
9, 10.e	WW	62	City of Santa Fe Springs Industrial Waste Disposal Permit# 8106
9, 10.e	WW	63	1996 Industrial Waste Disposal Permit App
9, 11	WW	64	ECG Chrome Precipitation & Evaporation System Operation & Maintenance Manual
9.a, 9.e	N/A	65	1979 Building Plan

SECTION G
(see Supporting Documents Folder)